

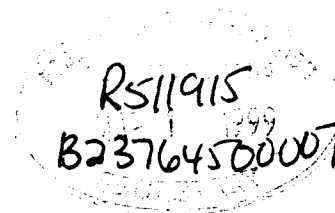
MINNESOTA FABRICARE INSTITUTE

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February 23, 1999

Secretary
Federal Trade Commission
6th and Pennsylvania Ave NW
Washington DC 20580



To Whom It May Concern:

We are writing in reference to 16 CFR Part 423 – Care Label Rule. We are a professional association of drycleaners and laundries in Minnesota. We have over one hundred members representing hundreds of facilities. We support alternative labeling because it provides disclosure to consumers, makes the U.S. system consistent with the system in the European Community, and allows for development of labeling for new fabric care methods such as wetcleaning.

Should the Rule be amended to require a washing instruction for all items that can safely be washed at home, even if drycleaning would be an appropriate alternative care method?

We think that alternative care labeling is the only way to provide the consumer with all appropriate methods of care. We think the consumer should have the opportunity to choose from all the methods available to them to care for their garments.

Should a washing instruction be required if the item can be successfully refurbished by washing but its useful life would be extended by drycleaning?

We have seen on many occasions consumers who decide to dryclean washable items because they want to extend the life of the garment. Again, we think that consideration should be given to the consumer and they should be made aware of their options.

Can criteria be identified that would assist manufacturers in determining when a home-laundering instruction, although technically feasible, should not be used because it would result in a less than ideally refurbished garment?

We think that this is something that should be pursued. We have seen many different types of clothing that should be drycleaned even though it is technically feasible to wash them. A case in point is black cotton trousers or shorts which look bad after repeated washing. The consumer often learns after the fact, but should be told up-front on the label, that drycleaning would keep the garment looking good much longer than washing.

Should the Commission amend the Rule to permit, or to require, a "Professionally Wetclean" instruction?

We are in favor of providing a wetcleaning care instruction in conjunction with instructions for other established care procedures.

How should the Rule define "Professional Wetcleaning"?

We have no suggestion here other than to say that we do not think the definition should be equipment as this is still an emerging technology.

Should the requirement specify a type of professional wetcleaning equipment?

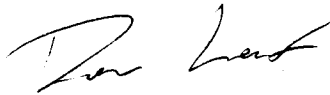
No.

Should the inclusion of other appropriate care methods be mandatory or optional?

Alternative labeling allows for inclusion of all appropriate care methods available to the consumer. The inclusion of all appropriate care methods should be made mandatory.

We thank you for the opportunity to comment. We would be happy to help conduct a consumer survey if one should be needed.

Best Regards,

A handwritten signature in black ink, appearing to read "Don Leaf", written in a cursive style.

Donnovan Leaf
President

A handwritten signature in black ink, appearing to read "Eric Ewald", written in a cursive style.

Eric Ewald
Executive Director